

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**CYNTHIA L. POLLICK,**  
**Plaintiff,**

**v.**

**MATTHEW M. HAAR, and**  
**SAUL EWING LLP,**  
**Defendants.**

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**NOTICE OF REMOVAL**

TO: United States District Court  
Middle District of Pennsylvania  
1501 North Sixth Street  
Harrisburg, PA 17102

Defendants Matthew M. Haar and Saul Ewing LLP hereby file the within Notice of Removal to the United States District Court for the Middle District of Pennsylvania from the Court of Common Pleas of Dauphin County, Pennsylvania. In support thereof, Defendants state as follows:

1. On or about October 17, 2023, Plaintiff Cynthia L. Pollick (“Plaintiff”) filed a Praecipe for Writ of Summons against Defendants in the Court of Common Pleas of Dauphin County, Pennsylvania, Civil Action No. 2023 CV 8164 (“Summons”). Copies of all documents filed in the Dauphin County action are attached hereto as Exhibit A.

2. The Summons relates to a pending matter before this Court, which matter is docketed at No. 1:21-mc-154 and is currently under seal. Because the

related matter in this Court is under seal, Defendants state only so much in this Notice of Removal as is necessary to establish proper removal. The facts of the related matter are well-known to the Court, and will be supplemented as necessary by Defendants while respecting the seal at the related matter.

3. Removal of this action is proper under 28 U.S.C. § 1442(a)(3).

4. A true and correct copy of the Notice of Removal will be filed with the Prothonotary of the Court of Common Pleas of Dauphin County, Pennsylvania, contemporaneously with the filing hereof.

5. This Notice of Removal is made subject to and without waiver of any rights Defendants may have with respect to Plaintiff's claims.

WHEREFORE, Defendants respectfully remove this matter to this Court.

Respectfully submitted,

Dated: February 9, 2024

/s/ Matthew M. Haar

Matthew M. Haar, Esq. (85688)

Saul Ewing LLP

2 N. Second Street, 7<sup>th</sup> Floor

Harrisburg, PA 17101

717-257-7508

matt.haar@saul.com

*Counsel for Matthew M. Haar  
and Saul Ewing LLP*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 9, 2024, I served a true and correct copy of the foregoing Notice of Removal via email and first class mail, postage prepaid, upon the following:

Cynthia L. Pollick, Esq.  
P.O. Box 757  
Clark's Summit, PA 18411  
pollick@lawyer.com

Dated: February 9, 2024

/s/ Matthew M. Haar

Matthew M. Haar